

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**[PROPOSED] NOTICE OF REMOVAL FROM MASTER SERVICE LIST**

**PLEASE TAKE NOTICE** that on [March \_\_, 2017], the Honorable Stuart M. Bernstein of the Bankruptcy Court for the United States District Court for the Southern District of New York, entered an order (the “Order”), ECF No. \_\_\_, granting the motion of Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation (the “SIPA Proceeding”) of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff, to Remove Former Parties In Interest from the Master Service List and for a Procedure to Effect Future Updates to the

Master Service List. The Order permits the Trustee, after adequate notice has been provided and without objection, to remove certain parties who are no longer parties in interest to this SIPA Proceeding as such term is used at 11 U.S.C. § 1109(b).

**PLEASE TAKE FURTHER NOTICE** that in accordance with, and pursuant to, the Order, all parties described on Exhibit A attached hereto will be removed from the Master Service List effective [35 DAYS FROM NOTICE], unless any such parties object to the removal.

**PLEASE TAKE FURTHER NOTICE** that any objection to the removal of the identified herein must specifically object to the removal and provide the claimant name, claim number and address for service. All objections must be written and must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 by no later than 4:00p.m. on [35 DAYS FROM NOTICE] (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein), and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq. and Nathanael Kelley, Esq. so as to be received on or before [35 DAYS FROM NOTICE].

**PLEASE TAKE FURTHER NOTICE** that this Notice will be provided by U.S. Mail, postage prepaid and email if applicable to [NAME]. The Trustee submits that no other or further notice is required.

Dated: New York, New York  
[DATE]

Respectfully submitted,

/s/

David J. Sheehan  
Email: dsheehan@bakerlaw.com  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Tel: (212) 589-4200  
Fax: (212) 589-4201

*Attorney for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*